



**HAMILTON, MILLER & BIRTHISEL, VI P.C.**  
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April 3, 2015

**VIA E-MAIL**

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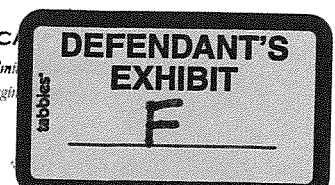
Re: Jessyca Redler; Bryan Redler v. Marriott International, Inc.;  
Marriott Owners Resorts (St. Thomas), Inc. d/b/a Marriott  
Frenchman's Cove; Marriott Ownership Resorts, Inc. d/b/a  
Marriott Vacation Club International  
D/O/I: April 15, 2012  
Case No.: 3:14-CV-17  
Our File No.: 71133-JQM

Dear Attorney Bentz:

As you know we have several expert depositions going forward in the months of April and May 2015. Specifically, we are taking the depositions of your experts including Dr. Alan Share, Dr. C.J. Abraham, and Dr. McGrath.

We write to obtain a proposed bill from each of your experts pursuant to Local Rule of Civil Procedure 26.3 (c). We anticipate that our depositions of your experts will take no longer than three (3) hours each. Please provide us with experts' reasonable proposed bill in accordance therewith and advise whether they will require prepayment. If they do, we propose pre-paying the reasonable cost for three hours of deposition testimony. If for some reason the deposition(s) last longer than three hours we will provide payment for the balance at the deposition via check.

We are in receipt of Dr. Abraham's statement in connection with his deposition requesting payment of \$5,500.00 for his deposition. Specifically, he appears to request payment from the defense for 5 hours of deposition preparation (\$1,500.00). As you know, the defense is not responsible for the Plaintiffs' expert's preparation time.



Karin A. Bentz, Esq.  
Law Offices of Karin A. Bentz, P.C.  
April 3, 2015  
Page 2

Additionally, he appears to request payment of \$4,000.00 for his deposition. We do not believe this is a reasonable fee for three hours of deposition testimony. It is unclear from Dr. Abraham's statement what his hourly deposition rate is.

We are in receipt of Dr. Ashare's rate schedule produced by you. The schedule indicates the fee for his deposition is \$3,750.00 per day and his fee for review of records and reports is \$750.00 per hour. We do not believe that \$3,750.00 is a reasonable fee for three hours of deposition testimony. Similarly, we do not believe the defense is responsible for the costs associated with Dr. Asahre's review of records and reports in anticipation of his deposition.

Please provide us with each of your expert's reasonable fees by close of business on Wednesday April 8, 2015. Additionally, please confirm in writing by Wednesday April 8, 2015 whether you will be producing your experts or whether we will need to issue subpoenas to them. We thank you in advance for your prompt attention to this matter.

Very truly yours,

HAMILTON, MILLER & BIRTHISEL, LLP

*Schuyler Smith*  
Schuyler Smith, Esq.

SAS